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Federal Defenders OF NEW YORK, INC.

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December 17, 2022

VIA ECF

Honorable Judge Richard M. Berman United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: <u>United States v. Stefan Melville</u> 22 CR 456 (RMB)

Dear Judge Berman:

SO ORDERED:	24	4 4	
Date: 12/19/22	Keeks	MA.	Secreta
	Richard M. Berman, U.S.D.J.		

On behalf of defendant Stefan Melville, I write to respectfully request a 30-day extension of the deadline for defense motions in this case, currently set for December 20, 2022. This is the first request for an extension of time of the motion deadline. I have conferred with AUSA Jeff Coyle who informs me the government does not object to this request.

The parties are in discussions regarding a possible pretrial resolution in this matter. Those discussions are progressing but require a little additional time. I therefore respectfully seek a 30-day adjournment of the briefing schedule in this matter in order to facilitate and conclude those negotiations.

As noted above, the government consents to this request. It further seeks, and the defense consents to, the exclusion of time under the Speedy Trial Act between December 20, 2022, and the date of the new motion deadline, pursuant to 18 U.S.C. § 3161(h)(7). The exclusion of time will allow the parties to finalize discussion of a pretrial resolution to this case and will further permit the defense time to properly review discovery and prepare any defensive motions.

Sincerely,

<u>/s/ Hannah McCrea</u> Hannah McCrea Assistant Federal Defender (646) 574-0351

CC: AUSA Jeff Coyle